

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HI JI,
LI MINJUN,
TU LAN,
ZHU FENG,

also known as “Johnny Zhu,”

KUANG ZEBIN,

also known as “Vincent Kuang,”

MICHAEL MCMAHON,
ZHAI YONGQIANG,
ZHENG CONGYING and
ZHU YONG,

also known as “Jason Zhu,

Defendants.

Case No. 1:21-cr-00265 (PKC) (S-1)

**NOTICE OF MOTION TO DISMISS
COUNTS I, II, III, AND IV OF THE
SUPERSEDING INDICTMENT AND
TO CHALLENGE VENUE AS TO
COUNTS II AND IV OF THE
SUPERSEDING INDICTMENT**

Filed Electronically

TO: All Counsel of Record

PLEASE TAKE NOTICE that, Defendant, Michael McMahon, by and through his counsel, Gibbons P.C. (Lawrence S. Lustberg, Esq. and Genna A. Conti, Esq. appearing) and Law Offices of Brian J. Neary (Brian J. Neary, Esq. appearing), shall move before the Honorable Pamela K. Chen, United States District Judge for the Eastern District of New York, at 225 Cadman Plaza East, Brooklyn, New York 11201, on a date to be set by the Court, for the entry of an order granting Defendant Michael McMahon’s Motion to Dismiss Counts I, II, III, and IV of the Superseding Indictment and to Challenge Venue as to Counts II and IV of the Superseding Indictment.

PLEASE TAKE FURTHER NOTICE that in support of this motion, defendant Michael McMahon shall rely upon the accompanying Brief in Support Defendant Michael McMahon's Motion to Dismiss Counts I, II, III, and IV of the Superseding Indictment and to Challenge Venue as to Counts II and IV of the Superseding Indictment, filed herewith.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith.

Dated: December 10, 2021

Respectfully submitted,

s/Lawrence S. Lustberg
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